

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

~ vs ~

SHAUHEEN SOHRABI,

Defendant.

CASE NO.: 5:18-CR-00182-4

JUDGE SOLOMON OLIVER, JR.

**UNOPPOSED MOTION TO CONTINUE
SENTENCING HEARING FOR FORTY-
FIVE (45) DAYS**

Now comes the Defendant, **Shauheen Sohrabi**, by and through his undersigned counsel, and respectfully requests this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for December 13, 2019, for a period of forty-five (45) days, for the following reasons.

Counsel, as stated in its previously filed *Motion to Continue*, is reviewing a voluminous amount of records relating to the Defendant's legitimate business pursuits. Additional time is needed by counsel to continue to obtain and review these records. It is essential that these records be received and properly reviewed by counsel prior to the preparation of an appropriate Sentencing Memorandum in this matter. The Defendant seeks this extension of time only in the interest of justice and based on the above reasons; not for undue delay.

The U.S. Attorney's office has been consulted and does not object.

WHEREFORE, for the foregoing reasons, it is respectfully requested that this Honorable Court issue an Order continuing the Sentencing Hearing, presently scheduled for December 13, 2019, for a period of forty-five (45) days.

Respectfully submitted,

/s/ - Michael J. Goldberg

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Counsel for **DEFENDANT RAUL TORRES**

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of November, 2019, a copy of the foregoing has been filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ - Michael J. Goldberg

MICHAEL J. GOLDBERG, ESQ.